

Hearing Date and Time: September 22, 2011 at 10 a.m. (EDT)

Response Date and Time: September 15, 2011 at 4:00 (EDT)

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re)	
)	Chapter 11
DPH HOLDINGS CORP., <i>et al.</i> ,)	
)	Case No. 05-44481 (RDD)
)	Jointly Administered
Reorganized Debtors.)	

**NOTICE OF REORGANIZED DEBTORS' MOTION FOR ORDER (I) ENFORCING
MODIFICATION PROCEDURES ORDER, MODIFIED PLAN AND PLAN
MODIFICATION ORDER INJUNCTIONS AGAINST TRUSTEE FOR THE
OLDCO M DISTRIBUTION TRUST, AND (II) DIRECTING TRUSTEE
TO DISMISS ACTION TO RECOVER DISCHARGED CLAIM**

(“OLDCO TRUSTEE INJUNCTION MOTION”)

PLEASE TAKE NOTICE that on August 31, 2011, DPH Holdings Corp. and certain of its affiliated reorganized debtors in the above-captioned cases (the “Reorganized Debtors”) filed a Motion for Order (i) Enforcing Modification Procedures Order, Modified Plan and Plan Modification Order Injunctions Against Trustee for the Oldco M Distribution Trust, and (ii) Directing Trustee to Dismiss Action to Recover Discharged Claim (the “Motion”).

PLEASE TAKE FURTHER NOTICE that a hearing to consider approval of the Motion will be held on September 22, 2011 at 10:00 a.m. (prevailing Eastern time) (the “Hearing”) before the Honorable Robert D. Drain, United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, Courtroom 118, White Plains, New York 10601-4140.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must (a) be in writing, (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, the Supplemental Order Under 11 U.S.C. §§102(1) And 105 And Fed. R. Bankr. P. 2002(m), 9006, 9007, And 9014 Establishing Omnibus Hearing Dates And Certain Notice, Case Management, And Administrative Procedures, entered March 20, 2006 (Docket No. 2883) (“Supplemental Case Management Order”), and the Nineteenth Supplemental Order Under 11 U.S.C. §§ 102(1) And 105 And Fed. R. Bankr. P. 2002(m), 9006, 9007, And 9014 Establishing Omnibus Hearing Dates And Certain Notice, Case Management, And Administrative Procedures, entered May 25, 2010 (Docket No. 20189) (together with the Supplemental Case Management Order, the “Case Management Orders”), (c) be filed with the Bankruptcy Court in accordance with General Order M-242 (as amended) – registered users of the Bankruptcy Court’s case filing system must file electronically, and all other parties-in-interest must file on a 3.5 inch disk (preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format), (d) be submitted in hard-copy form directly to the chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, and (e) be served upon (i) DPH Holdings Corp., 5725 Delphi Drive, Troy, Michigan 48098 (Attn: President), (ii) counsel to the Reorganized Debtors, Butzel Long, Stoneridge West, 41000 Woodward Avenue, Bloomfield Hills, Michigan 48304 (Attn: Thomas B. Radom and Cynthia J. Haffey), (iii) the Office of the United States Trustee for the Southern District of New

York, 33 Whitehall Street, Suite 2100, New York, New York 10004 (Attn: Brian S. Masumoto), and (iv) counsel for the agent under the Debtors' former postpetition credit facility, Davis Polk & Wardwell, 450 Lexington Avenue, New York, New York 10017 (Attn: Donald S. Bernstein and Brian M. Resnick) in each case so as to be **received** no later than **4:00 p.m. (prevailing Eastern time) on September 15, 2011.**

PLEASE TAKE FURTHER NOTICE that only those objections made as set forth herein and in accordance with the Case Management Orders will be considered by the Bankruptcy Court at the Hearing. If no objections to the Motion are timely filed and served in accordance with the procedures set forth herein and in the Case Management Orders, the Bankruptcy Court may enter an order granting the Motion without further notice.

Dated: Bloomfield Hills, MI
August 31, 2011

BUTZEL LONG, a professional corporation

By: /s/ Thomas B. Radom
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